

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE: PHARMACEUTICAL INDUSTRY AVERAGE  
WHOLESALE PRICE LITIGATION

MDL No. 1456  
C.A. No. 01-12257-PBS

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

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Judge Patti B. Saris

**MOTION FOR ADMISSION OF JORGE FRANCO, JR. *PRO HAC VICE***

Petitioner, Jorge Franco, Jr., Esq. of the law firm of Jennings, Haug & Cunningham, L.L.P., by and through the undersigned counsel, Hagens, Berman, Sobol, Shapiro, L.L.P., respectfully requests that Jorge Franco, Jr. be admitted to practice before the United States District Court for the District of Massachusetts, pursuant to LR, D.Mass. 83.5.3, and pursuant to this Court's Case Management Order No. 1, ¶ 16.

The undersigned avers as follows:

1. Petitioner, Jorge Franco, Jr., Esq. represents the consumer class representatives identified in the Fourth Amended Master Consolidated Complaint.

2. Mr. Franco was admitted (in March 2005) to practice before this Court *pro hac vice* for a limited purpose respecting his representation of the Intervener-Objector, Robert J. Swanston, *In Re: Lupron Marketing and Sales Practices Litigation*, MDL No.: 1430, Master File No.: 01-CV-10861.

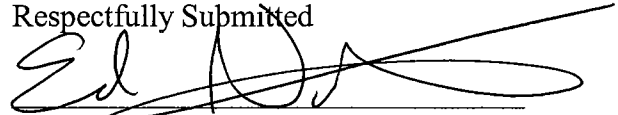
3. As stated in Mr. Franco's Affidavit attached hereto, he is a member in good standing of the bar of the State of Arizona and the United States District Court – District of Arizona. Further, there are no disciplinary actions pending against Mr. Franco in Arizona's jurisdiction.

4. Mr. Franco is familiar with the Local Rules of the United States District Court for the District of Massachusetts, and agrees to abide by them.

**WHEREFORE**, the undersigned counsel respectfully moves Mr. Crown's admission to this Court, pursuant to LR, D.Mass. 83.5.3.

Dated: 3-22-06

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'Ed Notargiacomo', written over a horizontal line.

Edward Notargiacomo, Esquire

**Hagens, Berman, Sobol, Shapiro**

One Main Street, 4<sup>th</sup> Floor

Cambridge, MA 02142

617-482-3277 telephone

617-482-3003 facsimile

**CERTIFICATE OF SERVICE**

I hereby certify that I, Ed Notargiacomo, an attorney, caused a true and correct copy of the foregoing, **MOTION FOR ADMISSION *PRO HAC VICE*** to be delivered to all counsel of record by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2, by sending on March 22, 2006, a copy to Lexis/Nexis File & Serve for posting and notification to all parties.

By: /s/ Ed Notargiacomo

Ed Notargiacomo  
Hagens Berman Sobol Shapiro LLP  
One Main Street, 4<sup>th</sup> Floor  
Cambridge, MA 02142

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**AFFIDAVIT OF JORGE FRANCO, JR.**  
**IN SUPPORT OF ADMISSION *PRO HAC VICE***

I, Jorge Franco, Jr., declare as true and correct that:

1. I am and have been a member in good standing of the bar of the State of Arizona since 1992.

2. I am and have been a member in good standing of the bar of the United States District Court – District of Arizona since 1992.

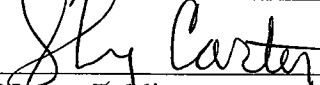
5. There are no disciplinary proceedings pending against me as a member of the bar in Arizona's jurisdiction.

6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts, and agreed to abide by them.

Dated: March 9, 2006

  
\_\_\_\_\_  
JORGE FRANCO, JR.

Sworn to and subscribed before me  
this 9<sup>th</sup> day of March, 2006.

  
\_\_\_\_\_  
Notary Public  
